

MICHAEL D. LONG (CA State Bar #149475)  
901 H Street, Suite 301  
Sacramento, CA 95814  
(916) 201-4188  
Mike.Long.Law@msn.com

Attorney for ADAN NAVARRO

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF AMERICA,	) No. 2:21-191 KJM
Plaintiff,	)
	) STIPULATION AND <del>PROPOSED</del>
v.	) ORDER TO TEMPORARILY
	) AMEND ADAN NAVARRO'S
	) CONDITIONS OF RELEASE
	)
ADAN NAVARRO,	) Date:
	) Time:
Defendant.	) Judge: Hon. Magistrate Jeremy D. Peterson
=====	)

Adan Navarro's special conditions of pre-trial release are found in ECF document 23, as amended in ECF documents 47 and 48. The parties agree it is appropriate to modify Special Condition 16, temporarily, to read:

"16. CURFEW: On the nights of December 24-25, 25-26, 2022, and December 31, 2022 – January 1, 2023, you must remain inside your residence every day from 12:30am to 5:00am, or as adjusted by the pretrial services officer for medical, religious services, employment or court-ordered obligations."

Please note that on the evenings of December 24, 25 and 31, 2022, Adan Navarro will be at family gatherings in the same apartment complex in which he currently resides.

IT IS HEREBY STIPULATED AND AGREED between the defendant Adan Navarro, by and through her undersigned defense counsel, and the United States of America, by and through

1 its counsel, Assistant U.S. Attorney David Spencer, that Special Condition 16 should be modified  
2 as written above.

3 I have spoken to PTS Rene Basurto. She does not oppose this modification of Special  
4 Condition 16. The newly Amended Condition is attached to this document.  
5

6  
7 Dated: December 22, 2022

Respectfully submitted,

8 /s/ Michael D. Long  
9 MICHAEL D. LONG  
10 Attorney for Adan Navarro

11 Dated: December 22, 2022

PHIL TALBERT  
United States Attorney

13 /s/ David Spencer  
14 DAVID SPENCER  
15 Assistant U.S. Attorney


16  
17 ~~[PROPOSED]~~ ORDER

18 **GOOD CAUSE APPEARING AND HAVING BEEN SHOWN, IT IS SO ORDERED.**

19 The Court hereby orders Special Condition 16, to read, temporarily, as follows:

20 “16. CURFEW: On the nights of December 24-25, 25-26, 2022, and December 31, 2022 – January  
21 1, 2023, you must remain inside your residence every day from 12:30am to 5:00am, or as adjusted  
22 by the pretrial services officer for medical, religious services, employment or court-ordered  
23 obligations.”  
24

25 Dated: December 22, 2022

26   
27 Hon. JEREMY D. PETERSON  
28 United States Magistrate Judge